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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE
CIVIL COMPLEX CENTER**

ELIAS PICASSO, individually and as
representative of the State of California on
behalf of all aggrieved employees,

Plaintiff,

v.

INNOVATIVE MEDICAL MANAGEMENT,
INC., a Nevada corporation, INNOVATIVE
MEDICAL MANAGEMENT, LLC, a
California limited liability company, and DOES
1 through 20, inclusive,

Defendants.

Case No. 30-2022-01238981-CU-OE-CXC

**NOTICE OF PLAINTIFF'S UNOPPOSED
MOTION AND PLAINTIFF'S
UNOPPOSED MOTION FOR AN
ORDER: (1) APPROVING THE
SETTLEMENT OF PLAINTIFF'S
INDIVIDUAL PAGA CLAIMS AGAINST
THE DEFENDANTS; AND (2)
DISMISSING THOSE PAGA CLAIMS
WITH PREJUDICE; MEMORANDUM
OF POINTS AND AUTHORITIES IN
SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION (filed under
separate cover); DECLARATION OF
DANIEL V. SANTIAGO IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
(filed under separate cover); and
[PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION
(filed under separate cover).**

Court Reservation No: 73729916

Judge: The Honorable James J. Di Cesare
Department: C16
Complaint Filed: January 3, 2022

1 TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that the Plaintiff, Elias Picasso, by and through his undersigned
3 counsel, will appear on June 17, 2022, at 9:30 a.m. before the Honorable Judge James J. Di Cesare
4 in Department C16 of the Superior Court of California, County of Orange, Civil Complex Center,
5 located at 751 West Santa Ana Blvd., Santa Ana, California, and move, and hereby moves, without
6 opposition by the Defendants, Innovative Medical Management, Inc. and Innovative Medical
7 Management, LLC, for an Order: (1) approving the settlement of Plaintiff's individual PAGA
8 claims against the Defendants; and (2) dismissing those PAGA claims with prejudice.

9 PLEASE TAKE FURTHER NOTICE that this Unopposed Motion is supported by, *inter*
10 *alia*: (1) the Memorandum of Points and Authorities filed concurrently herewith under separate
11 cover; (2) the Declaration of Daniel V. Santiago filed concurrently herewith under separate cover;
12 (3) the [Proposed] Order filed concurrently herewith under separate cover; and (4) any additional
13 information provided and/or arguments made at the hearing on this Unopposed Motion.

14 Dated: March 31, 2022

LAW OFFICES OF DANIEL V. SANTIAGO, P.C.

15 By:



16 Daniel V. Santiago, Esq.
17 Attorney for Plaintiff, Elias Picasso
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